



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 20, 1992

Trane Company
Attn: Bob Breedlove
6200 Troup Highway
Tyler, Texas 75711

Dear Mr. Breedlove:

Enclosed is a copy of the following RCRA Facility Assessment (RFA)
report completed by an EPA contractor.

*Facility Name: Trane Company*EPA ID Number: TXD007359284

The document is for your information and no response is required at
this time. You will be notified in the future if further action is
required. In the meantime, you may direct questions to me or your
staff may direct questions to Van Cammack at (214) 655-6790.

Sincerely yours,

Laurie King
Laurie King
Chief
OK/TX Section

Enclosure

cc: Minor Hibbs, TWC w/enclosure

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EXECUTIVE SUMMARY

ICF Incorporated (ICF), conducted a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) of Trane Company manufacturing plant in Tyler, Texas. The RFA included a preliminary document review (PR), followed by a visual site inspection (VSI). Files were inspected during the PR at the Texas Water Commission (TWC) and the U.S. Environmental Protection Agency (EPA) Region 6 offices. The PR was followed by a VSI to (1) determine the facility's current operating status, (2) identify solid waste management units (SWMU) and areas of concern (AOC), (3) assess the regulatory compliance of these units, and (4) assess actual and potential releases to the environment from those units.

The Trane Company facility consists of 1,000,000-plus square feet of manufacturing, warehousing, laboratory, and office space. In addition, Trane leases another building, known as Building 16, which is located on adjacent property. Most of these buildings have been used for manufacturing by previous owners (General Electric and ATV) since the 1960's.

Trane builds compressors, outdoor coils, and refrigerant flow controls for outdoor straight-cooling central air conditioning systems. In addition, the company builds Weathertron heat pumps, which can furnish both heating and cooling. The Trane Company generates both nonhazardous and hazardous wastes at this facility. They generate trichloroethylene wastes from the degreasing of compressors and copper tubing; wastewater treatment sludge from facility process waters including zinc, iron phosphate, and tin effluent; spent xylene from cleaning paint tools at the compressor paint booth; paint sludge from painting compressors at the paint booth; and acetone waste from cleaning wire dye tools in the control box assembly area. These hazardous wastes are containerized and stored in Container Storage Area No. 1 (SWMU No. 1) until they are transported off site for disposal.

Facility-generated nonhazardous wastes include paper, wood, and plastic from packaging of purchased parts; metal scrap generated from machining, punch presses, and coil assemblies; used oil generated from lube oils, compressor oils, etc.; mineral spirits generated in small wash tanks for compressor parts; and miscellaneous plant refuse. Most of the waste cardboard and wood is burned in the boiler/industrial furnace; excess paper and wood is compacted and taken off site for disposal. Facility generated scrap metals are stored in containers and taken off site for recycling. Waste oil is stored in the scrap dock area and is taken off site for disposal/recycling. Mineral spirits are processed in the Industrial Wastewater Treatment Facility (SWMU No. 5) and discharged to the municipal sewer.

The Trane Company facility has a permit for industrial solid waste management (Permit No. HW-50050-000) issued on February 19, 1985. The facility is authorized to manage 200 drums of waste (60 drums of wastewater treatment sludge, 60 drums of waste paint sludge, 60 drums of trichloroethylene still bottoms, and 20 drums of other waste) in an enclosed drum storage area.

ICF identified 26 potential SWMUs and 1 AOC during the PR. Based on the VSI, the potential SWMUs were reduced to 20, and there were no AOCs. The SWMU list was refined by (1) combining similar SWMUs, (2) deleting nonexistent SWMUs, and (3) adding new SWMUs. Of the 20 SWMUs, 3 are inactive. Three SWMUs require further investigation.

Based on the PR, VSI, and subsequent correspondence with facility personnel, a RCRA Facility Investigation is warranted for three SWMUs at this facility:

- 600 Gallon Underground Waste Oil Tank
- Sump and Oil/Water Separator at Building 16
- Subsurface Leach Bed Behind Building 16.

ICF does not recommend an RFI for any of the other SWMUs.